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13 CLINTON FOLGER, ET AL

14  
15 UNITED STATES DISTRICT COURT

16 NORTHERN DISTRICT OF CALIFORNIA

17 NORTHERN CALIFORNIA RIVER  
WATCH, a non-profit Corporation and  
18 COAST ACTION GROUP

19 Plaintiffs,

20 v.

21 CLINTON FOLGER, RUTH STADNIK,  
and NICK BRODRICK, Individually and  
in their capacities as members of GREEN  
22 PASTURES VALLEY, LLC; GREEN  
PASTURES VALLEY, LLC; DOES  
23 1 - 20, Inclusive,

24 Defendants.  
25 \_\_\_\_\_/

CASE NO.:3:10-cv-00741 JL

**STIPULATION RE CONTINUANCE OF  
CASE MANAGEMENT SCHEDULE;  
[PROPOSED] ORDER**

Case Mgmt. Conf. - June 15, 2011

1 This action was initially filed on February 22, 2010.

2 At the October 6, 2010 Case Management Conference, the Court adopted the discovery  
3 plan as set forth and agreed to by the parties (Order - Court Doc # 33) and referred the matter  
4 for mediation. No pretrial conference or trial date has been set.

5 The parties participated in Mediation with David Roe on February 16, 2011 which did not  
6 result in a resolution of this litigation.

7 Plaintiffs filed a Third Amended Complaint on February 25, 2011. Defendants filed an  
8 Answer to the Third Amended Complaint on March 30, 2011.

9 The parties have been active in the discovery process and have been in communication  
10 with respect to resolution of the dispute which is the subject of these proceedings since the time  
11 of mediation. The parties recently exchanged settlement proposals, have reached agreement on  
12 most issues, and believe that with some additional negotiation they will reach a final agreement  
13 on all terms within two to three months.

14 The parties believe a continuance of the current pretrial schedule for a period of  
15 approximately four months is therefore appropriate and will not harm or hinder these  
16 proceedings in any way.

17 IT IS HEREBY STIPULATED by and between counsel for Plaintiffs and Defendants that  
18 the current pretrial schedule dates may be continued and set as follows:

19	Discovery cutoff	November 30, 2011
20	Expert disclosure	December 31, 2011
21	Expert discovery cutoff	February 28, 2012
22	Dispositive motions	March 31, 2012
23	Final pretrial conference	July 30, 2012
24	Trial (5-7 days)	August 20, 2012.

25  
26 Dated: June 7, 2011

ANDRIAN & GALLENSON

27 By: /s/ Stephen M. Gallenson

STEPHEN M. GALLENSON

Attorney for Defendants

CLINTON FOLGER, ET AL

1 In addition to stipulating to the above, I, Jerry Bernhaut, attest that concurrence in the  
2 filing of this Stipulation has been obtained from the other signatory to this document.

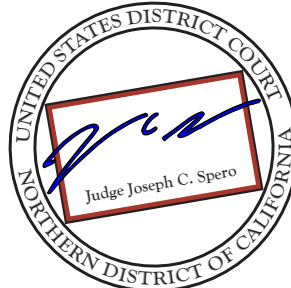
3  
4 Dated: June 7, 2011

/s/ Jerry Bernhaut  
JERRY BERNHAUT  
Attorney for Plaintiffs  
NORTHERN CALIFORNIA RIVER WATCH  
COAST ACTION GROUP

5  
6  
7  
8  
9 **[PROPOSED] ORDER**

10 PURSUANT TO SAID STIPULATION, **IT IS SO ORDERED.**

11 The Court further orders as follows:



15 DATED: 06/13/11

JAMES LARSON Joseph C. Spero  
Acting Chief UNITED STATES MAGISTRATE JUDGE